



Town of Moraga
Administration

April 2, 2009

Bruce H. Wolfe, Executive Officer
State Water Resources Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

**Re: Town of Moraga's Comments
February 11, 2009 Revised Tentative Order for the Municipal Regional Permit**

Dear Mr. Wolfe:

The Town of Moraga is a member of the Contra Costa Clean Water Program. We have participated in the ongoing MRP review and commented at the public hearing in writing and in person. We have reviewed the current Municipal Regional Stormwater NPDES Permit-Revised Tentative Order (February 11, 2009") and have provided comments to the Contra Costa Program.

The Contra Costa Program comment letter fully incorporates the Town of Moraga's concerns and comments. This letter endorses and incorporates by reference the Contra Costa Clean Water Program's comments dated April 3, 2009. We also endorse and incorporate by reference the Bay Area Stormwater Management Agencies Association's (BASMAA's) comment letter submitted and dated March 31, 2009.

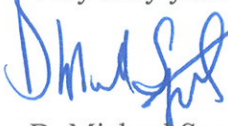
The Tentative Order of February 11, 2009 represents a significant improvement over the December 2007 draft. This is especially true of Section C.6, Construction Site Controls. Staff is to be commended in crafting a strong, appropriately detailed and clear set of construction site requirements that will strengthen, in a very practical way, enforcement of water quality protection in the construction environment.

However, we are still deeply concerned about the burdens that will be imposed by Section C.8, Water Quality Monitoring, and C.15, Exempted and Conditionally Exempted Discharges. The Program comment letter fully details these concerns. Some have suggested that the potential savings associated with reduced requirements for street sweeping and inlet cleaning under Municipal Maintenance, will offset the proposed increases in monitoring costs. However, it is important to point out that the Revised Tentative Order-Municipal Regional Permit represents a

significant addition to the amount of monitoring and reporting the permittees must do with an associated substantial increase in cost.

We urge the Board staff to acknowledge the concerns and suggestions provided by BASMAA and the Contra Costa Clean Water Program and to modify the Tentative Order as requested.

Very truly yours,



D. Michael Segrest
Town Manager

cc: Town Council
Jill Mercurio, Public Works Director/Town Engineer
Don Freitas, Program Manager, Contra Costa Clean Water Program